

Estimated Hearing Date: To be determined by the Court

Objection Deadline: To be determined by the Court

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of
THE COMMONWEALTH OF PUERTO RICO,
et al.

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

LIGHTHOUSE GROUP LLC'S MOTION FOR EXTENSION OF TIME
TO FILE REPLY TO ECF 24749

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

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TO THE HONORABLE LAURA TAYLOR SWAIN,
UNITED STATES DISTRICT JUDGE:

COMES NOW, Lighthouse Group, LLC (“Lighthouse”), represented by the undersigned attorneys, and very respectfully avers and prays as follows:

1. Lighthouse respectfully prays for an extension of time of Twenty (20) days, lapsing on Friday, September 1, 2023, to file its reply to the Financial Oversight and Management Board for Puerto Rico’s (“Board”) objection at ECF 24749 to the proof of claim filed by Lighthouse at claims docket ECF 15035.

2. Lighthouse is in the process of locating evidence which will allow it to file a comprehensive response to the objection filed by the Board. There are several transactions involved between the parties, including deed instruments recorded at the Commonwealth of Puerto Rico Registry of Property, which are relevant to Lighthouse’s reply brief.

3. The instant request will not unduly cause prejudice or cause unjustified delay in this matter, however, Lighthouse prays that the hearing on the objection scheduled for August 30, 2023 be set aside pending the submission of all pertinent briefs.

NOTICE

4. Notice has hereby been served by CM/EF and on the Master Service List posted on the website of the Debtors’ claims and noticing agent, by e-mail.

5. No prior request for the relief sought herein has been made to this Court or to any other Court.

WHEREFORE, LIGHTHOUSE GROUP, LLC respectfully prays that this Honorable Court grant it until Friday, September 1, 2023, to file its reply to the Financial Oversight and Management Board for Puerto Rico’s (“Board”) objection at ECF 24749 to the proof of claim filed by

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Lighthouse at claims docket ECF 15035, that the hearing on the objection scheduled for August 30, 2023 be set aside pending the submission of all pertinent briefs, with any other relief in its favor the Court deems proper.

RESPECTFULLY SUBMITTED.

Dated: August 12, 2023

Respectfully submitted,

REICHARD & ESCALERA, LLC

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